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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ELECTRONIC FRONTIER FOUNDATION,)	Case No. C 07-5278 SI
)	
Plaintiff,)	STIPULATION RE: MOTION FOR
)	SUMMARY JUDGMENT
v.)	
)	
OFFICE OF THE DIRECTOR OF NATIONAL)	
INTELLIGENCE,)	
)	
Defendant.)	

Plaintiff Electronic Frontier Foundation ("EFF") and Defendant Office of the Director of National Intelligence ("ODNI") hereby stipulate to the following and respectfully request that this stipulation be made an order of the Court:

1. The Court will enter an order granting ODNI's motion for summary judgment.
2. The Court will vacate the hearing on ODNI's motion for summary judgment currently scheduled for March 21, 2008.

3. To facilitate the parties' negotiation of attorneys fees, the parties stipulate to a waiver of the time limit established by Local Rule 54-6, to the extent that the order granting the motion for summary judgment may be deemed to be a "entry of judgment" under that rule. If EFF and ODNI are unable to reach a mutually acceptable resolution on attorneys fees, they agree to brief the issue according to the following schedule:

- EFF will move for attorneys fees no later than April 11, 2008.
- ODNI will oppose EFF's motion for attorneys fees no later than April 25, 2008.
- EFF will reply to ODNI's opposition no later than May 2, 2008.
- The Court will hear the motion for attorneys fees on May 16, 2008.

DATED: February 22, 2008

Respectfully submitted,

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